

CGB CC-0552

North Asheville Baptist Church

Pastor Jimmy Dykes

20 Reynolds Mountain Boulevard
Asheville, North Carolina 28804
828-658-9443

RECEIVED & INSPECTED

JUL 12 2006

FCC - MAILROOM

July 11, 2006

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
VIA: Federal Express
9300 East Hampton Drive
Capitol Heights, MD 20743

Ladies and Gentlemen:

We respectfully request the Commission consider North Asheville Baptist Church's request for Full Exemption from Closed Captioning Requirements, filed pursuant to 47 C.F.R. Section 79.1 of the Rules and Regulations of the Commission.

North Asheville Baptist is an unaffiliated, independent Baptist Church serving Buncombe County, North Carolina which includes the city of Asheville and the surrounding communities of Black Mountain, Royal Pines, Swannanoa, Woodfin, Fairview and Weaverville among others with a population of approximately 218,876¹. Our church was established in 1910, and currently has a membership of 1300. Our entire video ministry employs one full time paid staff person and relies on volunteers to fill support roles in the video taping of our Sunday services. As evidenced by the attached Budget Statement (Exhibit 1), the majority of the Church's budget is used in direct support of religious purposes of the Church and community outreach programs, NOT in support of the television ministry.

We have entered into a contract to air a one half hour, edited version of our Sunday services entitled "Eternal Truths" on WLOS Television beginning July 30, 2006. The cost of the one half hour airtime of these broadcasts is \$1600 per broadcast or \$83,200 annually. The coverage area provided by WLOS will allow us to reach the majority of the population within the area outlined in paragraph two above. We believe this broadcast will be an important addition to our ability to minister to our community, but certainly one we will not be able to afford if we must also Closed Caption the programs.

Our estimates of the additional expenses of closed captioning our programs are as follows:

Captioning of program² by outside vendor – ranges from \$374 per program/\$19,448 annually (CPC, Exhibit 2) to \$220 per program/\$11,440 annually (VCC, Exhibit 3).

¹ Data supplied by U.S. Census Bureau, population figure is a 2005 estimate

² Quotations are for "roll-up" captions

North Asheville Baptist Church Request of FCC

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Estimated shipping expense in forwarding the videotapes to the vendor captioning the programs \$5.82 (UPS Ground) **times two** (as customer will pay shipping both ways) which equates to \$11.64 per program/\$605.28 annually.

If the Church were to purchase its own equipment, the best price we have found is \$8000 from Image Logic (IL, Exhibit 4), not including an encoder. The vendor, Image Logic, indicates that if the program were delivered to the TV station on DVD format, an encoder would **not** be required, but at this time, WLOS does not accept programs on DVD. Therefore, an encoder will be required. The best verbal estimate we have been able to receive on the price of an encoder is between \$3000 and \$8000 making the expenditure between \$11,000 and \$16,000 – a capital outlay that will create a financial hardship for the Church.

An additional full time staff member would need to be added to create the captions with our own equipment: \$5.15 per hour (Federal Minimum Wage – provided we could employ someone with the necessary skills at that rate) times forty hours which equates to \$206 per week/\$10,712 annually (plus FICA and other salary expenses).

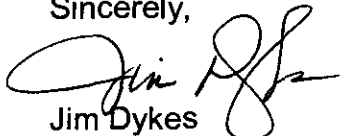
Therefore, the total anticipated cost to the Church of having Closed Captioning added to the program by an outside vendor would be between \$12005.28 and \$20,053.28 annually. Creating the Captions internally by purchasing the necessary equipment and adding the necessary staff person would cost the Church between \$21,712 and \$26,712 for year one with an ongoing cost of \$10,712 or more each year thereafter. Our Church simply cannot afford this type of financial burden on an annual basis.

As an alternative to Closed Captioning our programs, the Church will be pleased to provide a written transcript of any program within 72 hours of the request. We have not been asked to provide this service in the past, but feel that we could accomplish this without an undue burden being placed on our staff or finances.

It is our conclusion that if we must face the added expenses involved in the creation of Closed Captioning of our program, we will have to cancel the broadcast. That, in turn, will obviously have a significant impact on the Church's ability to minister to our community.

We appreciate the Commission's time and effort in reviewing our request.

Sincerely,



Jim Dykes

Senior Pastor

North Asheville Baptist Church

828-658-9443

Attached

EXHIBIT 1

N.A.B.C. Budget Statement

Closed Captioning Exemption Request
North Asheville Baptist Church
Asheville, North Carolina
July 11, 2006

2006 Budget Proposals – North Asheville Baptist Church

I. Operations

Utilities	\$4,000
Insurance	1,000
Office Supplies	5,000
Fellowship Supplies	2,500
Security Monitoring	45
Special Services	250
Debt Service	9,000
Communications	600
Computer Equipment – Network - Website	1,200
Traffic Officer	325
Church Vans Maintenance	400
Office Space Rental	1,200

II. Administration

Compensation (All Employees)	77,445
Employer Tax Liability	4000
Accounting Services	150
Conference & Travel	415

III. Education / Discipleship / Counseling / Encouragement Ministries

Children's Education	1,900
Small Group Resources	500
PLACE Training / Discipleship Training	100
Youth Group	3,600
Men's / Women's Ministries	550
Library	150
Biblical Counseling Materials	300
Senior Saints Ministry	600
Flowers	100
Prayer / Encouragement Ministries	100
Single Adult Ministry	1,300
Christian Life University	300
Discipleship	200

IV. Facility Maintenance

Cleaning Supplies	400
Inside Maintenance	1,500
Outside Maintenance	1,500

V. Audio / Video / Production Ministries

Music / Drama / Audio & Video Tapes / CD's / Sound / Lights / Projection	2,850
Video Equipment	4,000

VI. Outreach Ministries

Evangelistic Outreach	9,200
NABC Missions Outreach	3,900
Eternal Truths Television Air Time	1,000
New Worship Venues	2,000

Total Monthly Expenditures	\$143,580
Total Annual Budget	\$1,722,960
Weekly Offering Required	\$33,133

EXHIBIT 2

Computer Prompting & Captioning Company

Closed Captioning Exemption Request
North Asheville Baptist Church
Asheville, North Carolina
July 11, 2006



info@cpweb.com

800-977-6678

Your Section 508 Solution

Post Production Captioning/Subtitling

Pop-on mode: \$7/min. of video
+ \$150 setup fee

Roll-up mode: \$5/min. of video
+ \$150 setup fee

(You provide transcript & blank tape)

.....
Add \$3/min. of video if CPC transcribes.

CPC Computer Prompting & Captioning Co.

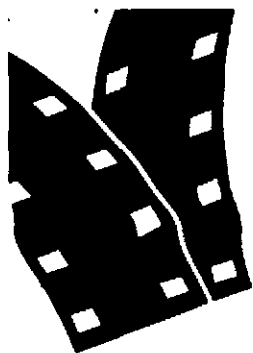
1010 Rockville Pike, Suite 306
Rockville, MD 20852, USA

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EXHIBIT 3

Video Caption Corporation

Closed Captioning Exemption Request
North Asheville Baptist Church
Asheville, North Carolina
July 11, 2006



VIDEO CAPTION CORPORATION

DATE: July 6, 2006

TO: Stuart Norfleet / North Asheville Baptist Church

FROM: Justin K. Macedonia / Video Caption Corporation

RE: Closed Captioning Proposal

Dear Stuart,

It was a pleasure speaking with you and having the opportunity to discuss close captioning your show. Video Caption Corporation very much appreciates the opportunity to submit this proposal to caption programming for North Asheville Baptist Church.

As we discussed, Video Caption Corporation is a full service captioning communications firm specializing in offline captioning services for broadcasters, corporations, independent producers, schools, libraries, churches, and government agencies.

We would propose to close caption the following programs at the discounted rates set forth below. ***Reduced rates reflect discounts for volume.***

<u>Program Titles</u>	<u># Shows / Length</u>
Weekly Church Program	52 half-hour shows
Total number of shows	52

Pricing

Roll-up Captioning (72 Hour Turnaround).....\$200 / 30 minutes

Tape Stock (DVCPRO).....\$20 / 30 minutes

Transcription.....Included

Caption Encoding.....Included

Stuart, we will always do our very best to make this process as easy and affordable as we can. If you have any questions or concerns, please do not hesitate to contact me at any time. I will call you in a few days to follow up. *I am certain we can develop a partnership that is mutually beneficial.*

Thank you for your time and your consideration of our proposal. We look forward to working with you.

Contact Information

I am available if you have any questions about this proposal. Please contact me anytime.

Telephone: (800) 705-1203

Facsimile: (845) 868-1188

Email: jkmacedonia@vicaps.com

Website: www.vicaps.com

Justin K. Macedonia
Video Caption Corporation

EXHIBIT 4

Image Logic Corporation

Closed Captioning Exemption Request
North Asheville Baptist Church
Asheville, North Carolina
July 11, 2006

AutoCaption3™

The Bottom Line: AutoCaption3 is Designed to Help You Make Money

Do what you need to do - and expand your markets - with a single captioning package.

For just USD \$8,000 you get the **only** off-line captioning system with all the features and flexibility:

- Closed captioning
- DVD caption assets
- subtitling
- foreign language captioning and even
- sign programming.

Autocaption Tools Power Your Productivity

We understand your business. We understand that productivity = profit. AutoCaption helps you save time and make money.

Autocaption automatically detects::

- Onset of Speech
- Edit Points

Autocaption Automatically Recommends:

- Caption Break Points

Autocaption Automatically Adjusts for:

- TimeCode Errors
- Unrealistic Reading Rates

Autocaption Provides:

- A WYSIWYG Display
- Free Digitizing Card and Software Capability
- As You Work Preview Capability
- UNICODE Foreign Language Support

And regardless of the media you're working with, or the type of captioning you're doing, **AutoCaption has a uniform user interface. That cuts training costs** and assures growth potential.

Image Logic supplies an integrated package of software, video source interfaces, and video digitizing hardware. AutoCaption itself is **complete** and ready to work with your video equipment and computer. You will, obviously, need a video source, caption inserter/encoder electronics, a DVD authoring package or a video recorder on your side of the captioning equation to render the captions on your final product.

Image Logic® Corporation 6807 Brennon Lane Chevy Chase, MD 20815-3255

Telephone: (301) 907 - 8891 E-mail: Info@imagelogic.com